



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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September 23, 2024

**BY ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Murray v. City of New York, et al.,  
24-CV-4918 (JLR)

Your Honor:

I am a Senior Counsel in the Office of Muriel Good Trufant, Acting Corporation Counsel for the City of New York, and attorney for defendant City of New York in the above-referenced matter.<sup>1</sup> Pursuant to the Court's July 23, 2024 Order, I respectfully write today on behalf of the defendant City to: (1) partially respond to the Court's Valentin Order directing the City to provide the names and shield numbers of the 13 unidentified correctional officers and 3 unidentified captains, relevant to plaintiff's Claims One, Two, and Four in this matter; and, (2) to respectfully request a thirty-day (30) extension of time to identify the remaining John or Jane Doe officers in plaintiff's Claims Five and Six. This is the City's first request for an extension of time to respond to the Valentin Order. Defendant was unable to obtain Plaintiff's position on this request due to his incarcerated status.

By way of background, plaintiff has asserted six separate claims alleging constitutional rights violations while detained in various facilities on Rikers Island between April 26, 2023, and May 6, 2023. (See ECF Dkt. No. 1). Claim One alleges excessive force by one John

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<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Jack McLaughlin, who is not yet admitted to the Southern District and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at [jmclaugh@law.nyc.gov](mailto:jmclaugh@law.nyc.gov).

Doe correctional officer and one John Doe captain while he was housed in the Anna M. Kross Center (“AMKC”) on April 26, 2023. Claim Two alleges excessive force by 5-6 masked John and Jane Doe correctional officers on April 27, 2023. Claim Four alleges an unspecified number of John and Jane Doe correctional officers used excessive force against plaintiff and put him in a cell without running water while he was housed in West Facility from April 28 to April 30, 2023. Claims Five and Six allege an unspecified number of John and Jane Doe correctional officers left plaintiff in a cell without food or water and would not open the door to give him food until he was found unresponsive on May 6, 2023.

On July 23, 2024, Your Honor directed the City to provide the names and shield numbers of John Doe defendants included in plaintiff’s operative pleading.

At this time the City is in receipt of documents identifying the following individuals from the Department of Correction (“DOC”) as the John and Jane Doe officers that plaintiff seeks to sue.

In connection with Claim One, the alleged excessive use of force at AMKC on April 26, 2023:

- Captain Berton Williams (Shield No.695).
- Correctional Officer Aldon Grant (Shield No.6701).

In connection with Claim Two, the alleged excessive use of force by masked John and Jane Doe officers between 2:30 a.m. and 5:00 a.m. at AMKC on April 27, 2023:

- Captain Osarogiagbon Edemakhiopa (Shield No.1713).
- Correctional Officer Brandon McNealy (Shield No.5331).
- Correctional Officer Jose Estevez (Shield No.13668).
- Correctional Officer Donald Derrick Jr. (Shield No.5026).
- Correctional Officer Derrick Stephens (Shield No.5292).
- Correctional Officer Raymond Munoz (Shield No.14668).
- Correctional Officer Omar Smith (Shield No.18633).

In connection with Claim Four, the alleged excessive use of force by an unspecified number of John and Jane Doe officers outside of and in his cell at West Facility between April 28 and April 30, 2023:

- Captain Nauvella LaCroix (Shield No.1841).
- Correctional Officer Gbenga Gbenjo (Shield No.4434).

- Correctional Officer Daniel Eudes (Shield No.18208).
- Correctional Officer Ernst Bonhomme (Shield No.12971).
- Correctional Officer Raymond Ortiz (Shield No.12861).
- Correctional Officer Thomson Milien (Shield No.4740).
- Correctional Officer Isolina Liriano (Shield No.13592).

Additionally, the City has been in communication with DOC to determine whether electronic requests for a waiver of service can be made under the e-service agreement for cases involving DOC defendants. A representative from DOC has indicated that they are in the process of making these determinations regarding each officer. The representative conveyed that they believe the waivers will be filed by the end of this week, if not sooner.

Finally, the City is still working diligently to identify the remaining John or Jane Doe defendants plaintiff alleges denied him food and water. In order to identify these additional individuals, the City respectfully requests a thirty-day (30) extension of time from September 23, 2024 to October 23, 2024 in order to fully respond to the Valentin Order.

The City thanks the Court for its time and consideration herein.

Respectfully Submitted,

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